

**ATTACHMENT A**

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Attachment A  
In Application Serial No. 09/859,660  
Filed May 16, 2001

**DECLARATION OF SRIDHAR DATHATHRAYA**

**UNDER 37 CFR §1.132**

I, Sridhar Dathathraya, hereby declare as follows:

1. My residence address is 20219, Mapes Ave, Cerritos CA 90703.
2. Since March 2000 I have been employed by Sharp Laboratories of America, Inc. ("SLA"), 5901 Bolsa Blvd, Huntington Beach, CA 92647. My title at SLA, is "Member Technical Staff". My responsibilities include research and development of application software.
3. I have read the claims for the patent application in question, System and Method for Discovering Network Components, invented by Guy Eden, Serial Number 09/859,660 (the Applicant). I have read the relevant parts of the Office Action dated September 20, 2004, where claims 2-26 have been rejected as obvious with respect to the Background Section of the Applicant's specification (AAPA), US Patent 5,987,535 (Knodt), and US Patent 6,398,478 (Bahlmann). In summary, it is my opinion that the cited references do not make obvious claims 2-26.
4. The Applicant's Background Section (AAPA) describes a conventional network where the graphical user interface (GUI) is not built until a query is made to all the network devices, and the query responses received. The AAPA clearly describes the time-out problem that can occur if

a query response is not received from a device thought to be available. The inventions described in claims 1, 13, and 15, are a solution to this problem. The claimed inventions build the GUI before the queries are sent.

5. Knodt describes, in greater detail, a system similar to the AAPA. The novelty of Knodt's invention, if any, appears to be in the graphical representation of system components. Channels and component capabilities are depicted on a screen. In many places in the patent (i.e., col. 4, ln. 4-32), Knodt generally touts the dynamic nature of the system, where the screen display provides immediate status. In my opinion, these statements mean that the screen display is responsive to devices inputs (query/response). The only specific example given by Knodt (Fig. 14), shows the screen display being updated in response to discovery (query/response). For example, in Fig. 14, the display features are dampened (Step 84) in response to a query that determines that a device is not in use (Step 82). Other steps in the figure show the same relationship between queries and screen updates. Like the AAPA, Knodt fails to describe a discovery mechanism that builds a GUI prior to initiating a query to a network device.

6. In my opinion, the combination of Knodt and the AAPA do not make the inventions of claims 1, 13, and 15 obvious. More specifically, I have been asked to consider whether Knodt suggests a modification to the AAPA that would make the claimed inventions obvious. I see no comments or drawings in the Knodt application that would suggest to me, or any other skilled artisan, that the AAPA conventional discovery mechanism can be modified. That is, I do not see how the Knodt reference would suggest that a GUI be built prior to the discovery process. As I mentioned above, Knodt is very clear is describing processes that only update the screen after device queries/responses.

7. Bahlmann describes a network troubleshooting tool. Most of the subject matter of the Bahlmann application is outside the scope of the present discussion, and the reference is mentioned in the Office Action to introduce the subject of the NSLookup function. However, if the element of the NSLookup function is added to the AAPA or to Knodt, this combination of references still does not make the invention of claim 1 obvious. As I mentioned above, Knodt makes no suggestion that the AAPA be modified into a method that builds a GUI prior to discovery. The addition of the NSLookup function to Knodt, still makes no suggestion that the AAPA be modified so as to make claim 1 obvious.

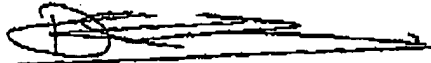
8. In summary, the combination of the Knodt and AAPA do not make the inventions of claims 1, 13, and 15 obvious, since they do not suggest that the GUI be built prior to discovery. Therefore, all the claims dependent from claims 1, 13, and 15 are non-obvious. Likewise, the combination of Bahlmann, Knodt, and the AAPA do not make the invention of claim 1 obvious for exactly the same reason; they do not suggest a modification to the AAPA that builds the GUI before discovery. Therefore, claim 8, which is dependent from claim 1, cannot be obvious.

9. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true, and further that these statements were made with the knowledge that willful, false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United State Code and that such willful, false statements may jeopardize the validity of the application or any patent issuing thereon.

SLA101d\_Declaration

10-13-2004

Date



Sridhar Dathathraya

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